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September 29, 2021

By ECF

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street, Room 2550
New York, NY 10007

9/30/21
Request a conference
with Judge. He is handling all
Majors work
discovery.

Re: *Gray, et al. v. City of New York et al.*, 1:21-cv-06610-CM (consolidated for discovery purposes with *In Re: New York City Policing During Summer 2020 Demonstrations*, 1:20-cv-08924-CM)

Dear Judge McMahon:

MEMO ENDORSED

My law firm and I represent the five photojournalists (the "Journalists") who have brought civil rights claims against the City of New York and individual police officers in the above-captioned action (the "Journalists' Suit"). By Memo Endorsement dated September 27, 2021 (Dkt. No. 19), Your Honor ordered that the Journalists' Suit be consolidated for purposes of discovery with the civil rights suits that comprise *In Re: New York City Policing During Summer 2020 Demonstrations*, 1:20-cv-08924-CM (the "Consolidated Action"). In the Memo Endorsement, Your Honor further stated that only discovery pertaining to the Journalists' claims may proceed on its own and noted that a court conference about discovery needs to be held.

Pursuant to the Court's Memo Endorsement, I write to respectfully request a conference to discuss discovery, scheduling and other procedural issues. We are available any day next week.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Robert D. Balin

Robert D. Balin

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